EXHIBIT F

                IN THE UNITED STATES DISTRICT COURT
                  NORTHERN DISTRICT OF CALIFORNIA
                     SAN FRANCISCO DIVISION

JOHN STEMMELIN, on behalf   )
of himself and all other   )
persons similarly   )
situated,   )
)
)
Plaintiff,   )   No. 3:20-cv-04168-WHA
)
        vs.   )
)
MATTERPORT, INC., a   )
Delaware corporation; RJ   )
PITTMAN; DAVE GAUSEBECK;   )
MATT BELL; CARLOS KOKRON;   )
PETER HEBERT; JASON   )
KRIKORIAN; and MIKE   )
GUSTAFSON,   )
)
)
Defendants.   )

          The deposition of WILLIAM CHE,

 called for examination pursuant to Federal Rules of

 Civil Procedure 30(b)(6) for the United States

 District Courts pertaining to the taking of

 depositions, taken before Dahlia Rivera Fazioli, a

 notary public within and for the County of Cook and

 State of Illinois,via Zoom webconference, on the

 1st day of December, 2021, at the hour of

 1:00 o'clock p.m., central standard time.

 Dahlia Rivera Fazioli, CSR, License No: 084-1579

1   Q.   I'm going to share my screen with you

2 again, and share another document in just a second.

3   MS. HARRIS: So I'd like to mark this as

4 Exhibit -- are we on 16?

5   THE COURT REPORTER: Yes.

6   MS. HARRIS: Thank you.

7   (Whereupon, CHE Deposition

8   Exhibit No. 16 was marked for

9   identification.)

10 BY MS. HARRIS:

11   Q.   So Exhibit 16 is exhibit -- was

12 Exhibit A to our joint discovery letter seven that

13 was filed in this case, and it lists Matterport

14 employees, their names, title is one column, job

15 description, plaintiff's position, defendant's

16 position. Do you see that?

17   A.   I do see it.

18   Q.   Okay. And then just certain of these

19 Matterport -- it says ESI data is not available for

20 this former employee.

21   Do you see that? I don't know

22 how to a pronounce that name, Gatika Aurora.

23 (Phonetic.)

24   Brian Frisbee, it says ESI data

1 is not available for this former employee.

2 (Phonetic.)

3   Paul Grasshoff, Andy Leventhal,

4 and Jordan Yount. Matterport says ESI data is not

5 available for this former employee.

6   So my question to you is, did you

7 search for these employees' ESI data?

8   A.   We -- I searched for the availability of

9 the contact. We did not do the actual search.

10 That was done by Lighthouse.

11   Q.   So what information did you give to

12 Lighthouse for them to conduct the search?

13   A.   We provided Lighthouse access, admin

14 access, to our Google Suite environment so they can

15 perform the search.

16   Q.   And Lighthouse came back and told you

17 that the information was deleted from the G Suite

18 environment for those former employees that I

19 showed you; is that correct?

20   A.   Lighthouse did not indicate if the

21 contact was deleted, but they -- they just

22 performed a search. They didn't provide any

23 information, either they were available or not.

24   Q.   If it wasn't available, doesn't that

1   mean it was deleted?

2   A.   I would agree, yes. If it was not

3   available from the Google search, then that means

4   the account was not in the Google Suite.

5   Q.   And do you know what the company's

6   procedure is with regard to litigation holds?

7   A.   Yes.

8   MR. JOHNSON: Objection to the question.

9   Exceeds the scope of the deposition notice topic.

10   BY MS. HARRIS:

11   Q.   Do you know if there was a litigation

12   hold in place regarding Stemmelin's -- this case,

13   Stemmelin's lawsuit or George Kenner's lawsuit

14   against Matterport?

15   A.   Yes.

16   Q.   Do you know the extent -- was there a

17   communication sent out to employees about the

18   litigation hold?

19   A.   Certain employees, yes.

20   Q.   Do you know how those certain employees

21   were selected to be sent the litigation hold

22   information?

23   A.   No, I do not know the selection process.

24   Q.   Do you know the names of the employees

1   that were sent the litigation hold instructions?

2   A.   I would need to confirm that, if the

3   recipient was blind copied or not, I don't recall.

4   Q.   Do you know when the litigation hold was

5   implemented at Matterport?

6   A.   I don't know off the top of my head

7   right now, when was it first sent out.

8   Q.   Well I guess my question is, if there

9   was a litigation hold in place, why were these

10   employees' G Suite data deleted?

11   A.   I would need to double check. I would

12   need to double check on certain individuals that

13   the ESI data is not available.

14   Q.   So sitting here today, you're not -- so

15   sitting here today, you don't know why the G Suite

16   data of the employees identified on Exhibit A was

17   deleted, even though there was a litigation hold in

18   place; is that correct?

19   A.   I don't know the reason right now,

20   that's right.

21   Q.   Are there any backup systems for the

22   G Suite environment that would have the G Suite

23   data that was deleted?

24   A.   We do use Code 42 to do our backups.

1   Q.   What's that called again?

2   A.   Code 42.

3   Q.   Is that searchable?

4   A.   I do not believe so. It's an archive,

5   so it's a backup file, it's not a live file.

6   Q.   So is there any way to go back and

7   retrieve the data of the former employees that was

8   deleted, to your knowledge?

9   A.   No, if it's deleted off of G Suite, then

10   it's not recoverable.

11   Q.   I just want to confirm something that I

12   think you already said.

13   So Matterport hired Lighthouse to

14   search the ESI of the custodians identified by

15   Matterport, using the agreed upon search terms;

16   correct?

17   A.   Yes.

18   Q.   Okay. I'm done with this document, so

19   I'm taking it down.

20   Next I want to ask you about

21   Zendesk. Do you know what Zendesk is and how

22   Matterport uses it?

23   A.   Yes.

24   Q.   Can you give a brief description of what